18th November 2024

Halima Chowdhury
Horsham District Council
Parkside,
Chart Way,
Horsham,
West Sussex
RH12 1RL

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Horsham District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Dear Halima

Application: **DC/24/01609**
Location: **75 High Street Steyning West Sussex BN44 3RE**
Proposal: **Demolition of existing single storey rear extension, garage, and garden room. Erection of single storey rear extension and replacement garage and garden room (Householder)**

Thank you for consulting Place Services on the above householder application.

a) No ecological harm/No objection	
b) Requires further information on European Protected Species (bats)	Yes
c) Recommend grant permission subject to conditions	
d) Recommend refusal	
e) Subject to Natural England's formal comments on the conclusion of the Water Neutrality Appropriate Assessment	Yes
f) Discharge of condition	

Please note that following receipt of Natural England's position statement on developments in the Sussex North Water Supply Zone, decisions on planning applications should await the completion of a Sussex North water neutrality strategy unless they can demonstrate water neutrality.

Summary

We have reviewed the Preliminary Ecological Appraisal (Phlorum Limited, October 2024), supplied by the applicant, relating to the likely impacts of development on designated sites, protected & Priority species and habitats, and identification of proportionate mitigation. Please note that comments on mandatory Biodiversity Net Gain are provided by Horsham District Council in-house.

We note from the the Preliminary Ecological Appraisal (Phlorum Limited, October 2024) that buildings B1 (main house) and B2 (summer house) have low suitability to support roosting bats due to the presence of potential roost features for bats. The Preliminary Ecological Appraisal (Phlorum Limited, October 2024) highlights that a single emergence / re-entry survey should be undertaken on buildings B1 and B2 in line with Bat Conservation Trust 4th Ed. Good Practice Guidelines (Collins ed., 2023) to determine the presence or likely absence of bats as well as to characterise any bat roosts that could be present. We highlight that the bat emergence survey results and details of any mitigation measures required must be provided prior to determination to inform the need for a bat licence from Natural England in accordance with Government Standing Advice.

The results of the surveys for bats are required prior to determination because paragraph 99 of ODPM Circular 06/2005 highlights that: "*It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.*"

This information is required to provide the LPA with certainty of impacts on legally protected species and be able to secure appropriate mitigation either by a mitigation licence from Natural England or a condition of any consent. This will enable the LPA to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006 (as amended) and prevent wildlife crime under s17 Crime and Disorder Act 1998.

Additional information

We note that Building B3 (garage) has negligible bat roost potential (Preliminary Ecological Appraisal (Phlorum Limited, October 2024) and we therefore agree that no further surveys for bats are required for this building.

We note from the Application Form that no trees or hedges will be impacted by the development. Therefore no Ground Level Tree Assessments for potential roost features for bats with regard to trees are required.

As mobile protected species (such as Hedgehog, reptiles and Common Toad) may be present onsite, we recommend the implementation of a Precautionary Method Statement for mobile species. This should be secured by a condition of any consent.

We also support the proposed reasonable biodiversity enhancements, which have been recommended to secure net gains for biodiversity, as outlined under Paragraph 180d and 186d of the National Planning Policy Framework (December 2023). The reasonable biodiversity enhancement measures should be

outlined within a Biodiversity Enhancement Layout and should be secured by a condition of any consent for discharge prior to slab level.

Please note we have no comments on Great Crested Newt as we have been instructed to leave comments on this European Protected Species to the NatureSpace Partnership.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely

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Place Services provide ecological advice on behalf of Horsham District Council
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.